



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, # 600

Portland, OR 97232-4100

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FAX (503) 229-6945

TTY 711

May 21, 2015

Also Sent Via Email

Dana Zanone  
Zanone Consulting  
1436 Second Street #176  
Napa, California 94801

RE: DEQ Comments for *May 20, 2015 Draft Comprehensive Source Control Schedule* the Container Management Site at 3000 N.W. Saint Helens Road Portland, Oregon  
ECSI #4784

Dear Mr. Zanone:

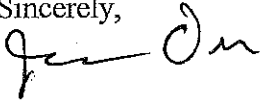
Thank you for your submittal of the *May 20, 2015 Draft Comprehensive Source Control Schedule* for the Container Management Services Site. DEQ appreciates your aggressive schedule to remove highly contaminated (hot spot) soils and to perform other required source control measures at the site. We look forward to an efficient completion of site work that leads to a source control decision.

The Department of Environmental Quality has the following comments.

1. Is it possible to complete field implementation of the Front Yard and Soule Yards in the summer and fall of 2015? This would allow stormwater compliance sampling this winter.
2. Based on the current schedule, the stormwater evaluation would have to be completed in the winter of 2016 due to the requirements for stormwater sampling events.
3. The schedule should include the projected submittal of a source control evaluation report, which would be dependent on results of stormwater sampling.
4. Please initiate a preliminary permit review with the City of Portland of all the proposed work. This review will help facilitate approvals and identify potential requirements of the city stormwater manual. The preliminary review should include the potential disconnection of the drum stormwater line and all excavations/capping plans. You may contact Sabrina Nelson Deal, City of Portland Projects Plan Review at 503-823-5843 or by email-[sebrina.nelson-deal@portlandoregon.gov](mailto:sebrina.nelson-deal@portlandoregon.gov) to discuss the review of plans. This task should be added to the schedule.

Please call me at (503) 229-5039, if you have questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Orr", written over the word "Sincerely,".

Jim Orr, R.G.  
Project Manager  
DEQ NW Region Cleanup Section

cc: ECSI File 4784  
Mohammad R. Bazargani P.E, Strategic Engineering and Science  
Steve Kemnitz, Strategic Engineering and Science  
Alex Liverman, DEQ NWR  
Linda Scheffler, City of Portland  
Kristine Koch, EPA  
Sean Sheldrake, EPA

Attachments: May 20, 2015 Email and St. Helens-Stormwater Source Control Schedule

4784  
Working  
Container

ORR Jim

**From:** Dana Zanone [dzanone@imacc-corp.com]  
**Sent:** Wednesday, May 20, 2015 6:31 PM  
**To:** ORR Jim  
**Cc:** Mohammad Bazargani  
**Subject:** St Helens - Stormwater Source Control - Comprehensive Schedule - Draft  
**Attachments:** St Helens - Stormwater Source Control - Comprehensive Schedule - Draft - 05 20 2015 - 1.pdf

Jim,

Please review the attached draft comprehensive schedule addressing the stormwater analytical program, feasibility study, remedial design, field implementation in the yards, additional work requested by ODEQ, tracking control planning and stormwater testing next season. Your comments are requested.

We are planning to implement remedial action in the SW-8 yard first, followed by the Front Yard and then the Soule Yard. The SW-8 carries a high priority because the discharge is not measured at SW-3 and because of the high level of contamination at two spots in the yard. Although this is not final, we are contemplating asphaltting the yards. To facilitate tracking controls, we are planning three crossings over the BNSF RR ROW with asphalt aprons connecting our yards and we are expecting that CMS will develop tracking control measures concerning yard traffic.

Preceding the Front Yard and Soule Yard remedy implementation the City will need to address:

- Proposed Drum pipe removal - Closure of the Drum Pipe in the front yard will require the City to plan for a new route for St Helens Road water.
- Lake Street discharge - The remedy in the front yard will raise the yard 12 inches and we are concerned that Lake Street water presently discharging into SW-1 will flood and continue to discharge into our front yard.

Both subjects should be addressed by the City before we can begin construction in the Front Yard. As a result I have extended the potential completion of remedies in the Front and Soule yards to the first half of 2016.

Planning for Tracking controls (IMACC and CMS) is scheduled to be completed in early August with implementation expected as yard remedies are completed. Tracking controls will also involve the installation of three BNSF rail crossings (between the North driveway and Drum Furnace yard; between the Plant and Soule yard; and the Front Yard and Soule Yard). Planning for and obtaining permission to develop track crossings will also need to precede yard remedies.

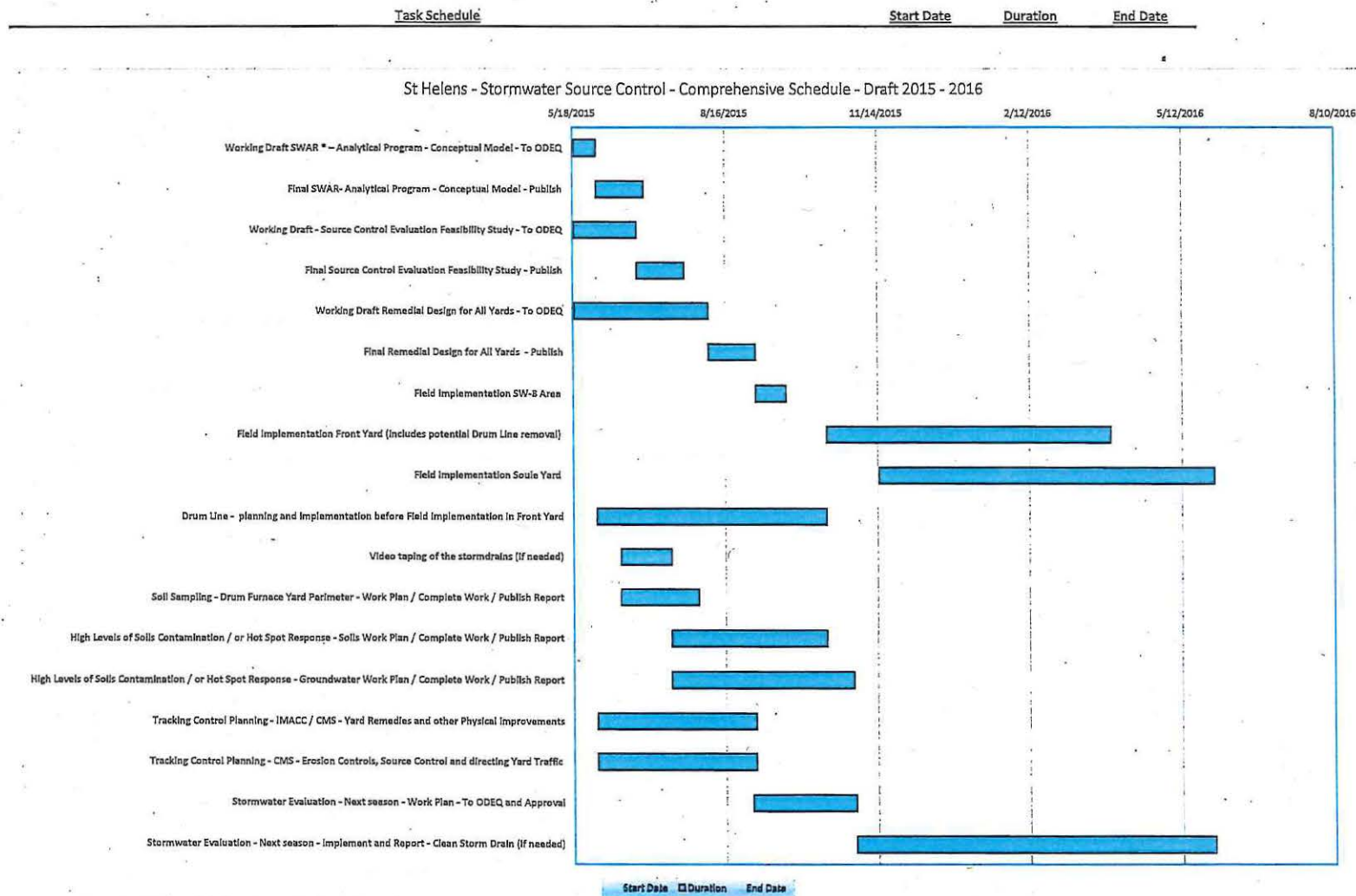
The stormwater evaluation testing shown for the next stormwater season are assumed to occur following the remedy implementations in each yard. Presently the schedule for testing assumes all yards will be complete, however, the testing at SW-12 and SW-3 will actually begin after the remedies are complete in the Front and Soule yards.

Your comments are appreciated.

Dana

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# St Helens - Stormwater Source Control - Comprehensive Schedule - Draft 2015 - 2016



St Helens - Stormwater Source Control - Comprehensive Schedule - Draft 2015 - 2016

<u>Task Schedule</u>	<u>Start Date</u>	<u>Duration</u>	<u>End Date</u>
Working Draft SWAR * - Analytical Program - Conceptual Model - To ODEQ	5/19/2015	13	6/1/2015
Final SWAR - Analytical Program - Conceptual Model - Publish	6/1/2015	28	6/29/2015
Working Draft - Source Control Evaluation Feasibility Study - To ODEQ	5/19/2015	37	6/25/2015
Final Source Control Evaluation Feasibility Study - Publish	6/25/2015	28	7/23/2015
Working Draft Remedial Design for All Yards - To ODEQ	5/19/2015	79	8/6/2015
Final Remedial Design for All Yards - Publish	8/6/2015	28	9/3/2015
Field Implementation SW-8 Area	9/3/2015	18	9/21/2015
Field Implementation Front Yard (includes potential Drum Line removal)	10/15/2015	168	3/31/2016
Field Implementation Soule Yard	11/15/2015	198	5/31/2016
Drum Line - planning and implementation before Field Implementation in Front Yard	6/1/2015	136	10/15/2015
Video taping of the stormdrains (if needed)	6/15/2015	30	7/15/2015
Soil Sampling - Drum Furnace Yard Perimeter - Work Plan / Complete Work / Publish Report	6/15/2015	46	7/31/2015
High Levels of Soils Contamination / or Hot Spot Response - Soils Work Plan / Complete Work / Publish Report	7/15/2015	92	10/15/2015
High Levels of Soils Contamination / or Hot Spot Response - Groundwater Work Plan / Complete Work / Publish Report	7/15/2015	108	10/31/2015
Tracking Control Planning - IMACC / CMS - Yard Remedies and other Physical Improvements	6/1/2015	94	9/3/2015
Tracking Control Planning - CMS - Erosion Controls, Source Control and directing Yard Traffic	6/1/2015	94	9/3/2015
Stormwater Evaluation - Next season - Work Plan - To ODEQ and Approval	9/1/2015	61	11/1/2015
Stormwater Evaluation - Next season - Implement and Report - Clean Storm Drain (if needed)	11/1/2015	212	5/31/2016

\* Stormwater Assessment Report (SWAR)